

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

RIMONA GROUP, LLC,

*Plaintiff,*

v.

SENTINEL INSURANCE COMPANY,  
LTD.

*Defendant.*

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CIVIL ACTION NO. 4:16-cv-2417

**NOTICE OF REMOVAL**

Defendant Sentinel Insurance Company, Ltd. (“Defendant” or “Sentinel”) files this Notice of Removal and, in support thereof, would show the Court as follows:

1. On July 11, 2016, Plaintiff Rimona Group, LLC (“Plaintiff”) filed its Complaint (the “Petition”) in Cause Number 2016V-0097, in the 155th Judicial District Court of Austin County, Texas. Defendant was served on July 15, 2016. Defendant filed its answer on August 5, 2016.

2. Pursuant to 28 U.S.C. § 1446(a) attached hereto are copies of all process, pleadings and orders served upon Defendant and all pleadings and orders in the removed case. In particular: (i) an index of the matters filed herewith is attached as Exhibit A; (ii) a copy of the citation and executed service return is attached as Exhibit B; (iii) a copy of the Plaintiff’s petition is attached as Exhibit C; (iv) a copy of Defendant’s answer is attached as Exhibit D; (v) a copy of the docket sheet in the state court action is

attached as Exhibit E; and (vi) a list of all counsel of record, including addresses, phone numbers, and the parties represented is attached as Exhibit F.

3. This notice of removal is timely filed under 28 U.S.C. §1446(b) because it is filed within thirty days after Defendant first received a copy of a paper from which it could first be ascertained that the case is one which is or has become removable; *i.e.*, Plaintiff's Petition.

4. The claims asserted against Defendant are civil actions over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1332. At the time this action was commenced, Plaintiff was, and still is a citizen of the State of Texas because it is a limited liability company formed in and under the laws of the State of Texas and has its principal place of business in Texas. Defendant was, at the time this action was commenced, and still is, a citizen of the State of Connecticut because it is incorporated under the laws of the State of Connecticut and has its principal place of business in Connecticut.

5. The amount in controversy exceeds \$75,000 based on Plaintiff's Petition and Civil Case Information Sheet. *See Ex. C* at ¶¶ 12, 17-19; *Ex. B*.

6. The one-year statute of limitation on removal of diversity cases imposed by 28 U.S.C. § 1446(b) does not prevent removal because this action was commenced less than one year ago.

7. Notice to State Court. Pursuant to 28 U.S.C. § 1446(d), Defendant intends to serve written notice of this removal on the state court promptly after filing this Notice of Removal.

FOR THESE REASONS, Defendant hereby effectuates removal of this cause to this Court.

Respectfully submitted,

/s/ Brittan L. Buchanan

Brittan L. Buchanan

Lead Attorney

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**ATTORNEYS FOR DEFENDANT SENTINEL  
INSURANCE COMPANY, LTD.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the above and foregoing document was served on counsel of record below via facsimile on August 9, 2016.

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/s/ Laura J. Grabouski  
Laura J. Grabouski